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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. **2010-236**

13 **STEPHANIE MARIE GUERRERO**
14 **P.O. Box 645**
15 **Seaside, California 93955**
16 **Registered Nurse License No. 558784**

A C C U S A T I O N

Respondent.

17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
20 official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department
21 of Consumer Affairs.

22 2. On or about August 16, 1999, the Board of Registered Nursing issued Registered
23 Nurse License Number 558784 to Stephanie Marie Guerrero (Respondent). The Registered
24 Nurse License was in full force and effect at all times relevant to the charges brought herein and
25 will expire on September 30, 2011, unless renewed.

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1 appeal has elapsed, or the judgment of conviction has been affirmed on appeal, or when an order
2 granting probation is made suspending the imposition of sentence, irrespective of a subsequent
3 order under the provisions of Section 1203.4 of the Penal Code."

4 8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
5 administrative law judge to direct a licentiate found to have committed a violation or violations of
6 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
7 enforcement of the case.

8 FIRST CAUSE FOR DISCIPLINARY ACTION

9 (Substantially Related Conviction)

10 9. Respondent has subjected her registered nurse license to disciplinary action under
11 Sections 2761(f) and 490 of the Code in that she was convicted of a crime substantially related to
12 the qualifications, functions or duties of a registered nurse in that on or about April 14, 2009, in
13 the Superior Court of California, County of Monterey, Case Number MS272522A, entitled *The*
14 *People of the State of California vs. Stephanie Guerrero*, Respondent was convicted by the court
15 on her plea of nolo contendere of violating Section 242 (battery), a misdemeanor. Pursuant to
16 said conviction, the imposition of sentence was suspended and Respondent was placed on
17 conditional probation for three (3) years on terms and conditions which included, but were not
18 limited to, the following: do not commit same or similar offense; attend and complete 5 sessions
19 of Anger Management Classes through family service agency, licensed therapist or licensed
20 agency; have no contact directly or indirectly with the victims¹ R. M. and H. E; serve 1 day in jail
21 with credit for term served of 1 day; and pay a \$450.00 fine. The factual circumstances
22 surrounding the conviction are as follows:

23 a. On or about October 9, 2008, after repeatedly telephoning her former boyfriend,
24 R. M., Respondent went to his residence in Seaside, California, banged loudly on the front door,
25 and was let into the residence by R. M.'s father, L. M.. Then, although R. M. attempted to
26 prevent Respondent from further entering the residence, she was able to get past him and went

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28 ¹ The victim will be referred to by initials only in order to preserve confidentiality.

1 towards his bedroom where she attacked R. M.'s current girlfriend, H.G., by hitting her repeatedly
2 on the head with a TV remote control in the bedroom. Respondent also hit H. G. in the face with
3 her fist and called her a "stupid bitch." R. M. and his father were able to separate the two and
4 force Respondent out of the residence. However, while R. M. was struggling with Respondent,
5 she scratched him on his face, neck, upper left arm, and on his testicles.


6 b. As a result of being assaulted by Respondent, H. G. sustained redness and swelling to
7 her right eye, an approximate quarter inch scratch below her left eye, as well as bruising and
8 swelling to the fingers of her left hand. Respondent also broke the cell phone belonging to R. M.

9 PRAYER

10 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
11 and that following the hearing, the Board of Registered Nursing issue a decision:

- 12 1. Revoking or suspending Registered Nurse License Number 558784, issued to
13 Stephanie Marie Guerrero (Respondent);
- 14 2. Ordering Respondent to pay the Board of Registered Nursing the reasonable costs of
15 the investigation and enforcement of this case, pursuant to Business and Professions Code section
16 125.3; and
- 17 3. Taking such other and further action as deemed necessary and proper.

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19 DATED: 10/22/09


LOUISE R. BAILEY, M.ED., RN
Interim Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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